VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II,

٧.

Plaintiff and Counterclaim Defendant,

Civil Action No.: CL-2019-0002911

AMBER LAURA HEARD,

Defendant and Counterclaim Plaintiff.

PLAINTIFF AND COUNTERCLAIM DEFENDANT JOHN C. DEPP, II'S OBJECTIONS TO DEFENDANT AND COUNTERCLAIM PLAINTIFF AMBER LAURA HEARD'S WITNESS LIST

COMES NOW Plaintiff and Counterclaim Defendant John C. Depp, II ("Plaintiff" or "Mr. Depp), by counsel, hereby objects to the witnesses identified by Amber Laura Heard ("Ms. Heard" or "Plaintiff") as set forth below. The Objections identified below are not intended to reflect all objections pertinent to the witness' potential testimony or related documents; objections to particular testimony, the appropriate scope and subject of testimony, and any particular documents, are expressly reserved. Furthermore, the fact that a particular witness is not objected to below is not intended and should not be construed as a concession that such witness' testimony is relevant, appropriate, admissible, or otherwise necessary for the trier of fact. Mr. Depp reserves the right to withdraw, supplement, or otherwise modify the below objections as appropriate, including based on developments at trial or in pre-trial rulings.

Name	Objections
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Ackert, Julian	Objection. Mr. Ackert should be excluded
	entirely for the reasons set forth in Mr. Depp's
	pending Motion in Limine (No. 19) and Motion
	for Sanctions.

testimony limited for the reasons set forth in Mr. Depp's pending Motion in Limine (No. 15). Banks, Amy Objection. Ms. Banks' testimony should be excluded in its entirety for the reasons set forth in Mr. Depp's pending Motion in Limine (No. 23). Barkin, Ellen Objection. Ms. Barkin's testimony should be excluded in its entirety for the reasons set forth in Mr. Depp's pending Motion in Limine (No. 13). Bercovici, Adam Objection. Mr. Bercovici's testimony should be excluded in its entirety for the reasons set forth in Mr. Depp's pending Motion in Limine (No. 13). Objection. Mr. Bercovici's testimony should be excluded in its entirety for the reasons set forth in Mr. Depp's pending Motion in Limine (No. 12). Objection. Mr. Bloom should be excluded on relevance grounds and for the reasons set forth in Mr. Depp's pending Motion in Limine (No. 12). Objection. Mr. Bloom should be excluded on relevance grounds and for the reasons set forth in Mr. Depp's pending Motion in Limine (No. 12). Objection. Mr. Bloom should be excluded in its entirety for the reasons set forth in Mr. Depp's pending Motion in Limine (No. 13). Objection. Mr. Bloom should be excluded in its entirety for the reasons set forth in Mr. Depp's pending Motion in Limine (No. 12). Objection. Mr. Bloom should be excluded in its entirety for the reasons set forth in Mr. Depp's pending Motion in Limine (No. 12). Objection. Mr. Bloom should be excluded in its entirety for the reasons set forth in Mr. Depp's pending Motion in Limine (No. 12). Objection. Improper designation of custodian declaration, not appropriately included on witness list. All objections to particular documents and sufficiency of declaration are reserved. Objection. Improper designation of custodian declaration, not appropriately included on witness list. All objections to particular documents and sufficiency of declaration are reserved. Objection. Improper designation of custodian declaration, not appropriately included on witness list. All objections to particular documents an		Depp's pending Motion in Limine (No. 15). Objection. Ms. Banks' testimony should be
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	American Civil Liberties Union	declaration, not appropriately included on witness
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		declaration, not appropriately included on witness
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Walt Disney Motion Pictures Group, Inc.	declaration, not appropriately included on witness
Walt Dishey Wouldn't lotates Group, me.	list. All objections to particular documents and
	sufficiency of declaration are reserved.
Gottlieb, Jodi	Objection. Ms. Gottlieb was never produced for
Counce, sour	deposition despite having been served with a
	valid subpoena. Indeed, Ms. Gottlieb is in open
	contempt of a California subpoena. Moreover,
	she was in communication with Ms. Heard's
	counsel prior to failing to appear for her
	deposition. Ms. Gottlieb should be excluded
	entirely. In the alternative, Ms. Gottlieb should
	not be permitted to testify without sitting for
	deposition by Mr. Depp's counsel.
Harrell, Cornelius	Objection. Relevance.
Henriquez, Whitney	Objection. Ms. Henriquez is represented in this
110miquoz, minuoj	action by Ms. Heard's counsel. When Ms.
	Henriquez was deposed in this action, Ms.
	Heard's counsel cut short her deposition after a
	mere 3.5 hours, and then represented to counsel
	for Mr. Depp that Ms. Henriquez was unable to
	resume the deposition for an extended period of
	time for medical reasons, while also asserting that
	Ms. Heard's counsel intended to consume any
	remaining time at deposition by posing questions
	to their own client. The Monday after the Friday
	March 11, 2022, discovery cutoff, Ms. Heard's
*	counsel subsequently offered Ms. Henriquez for
	deposition, but continued to insist that Ms.
	Heard's counsel would consume the questioning
	time.
	Ms. Henriquez should be excluded entirely due to
	Ms. Heard's counsel's deliberate and blatant
	efforts to obstruct her deposition. In the
	alternative, she should be required to sit for a
	further 3.5 hours of deposition by Mr. Depp's
	counsel, before being allowed to testify at trial.
Hughes, Dawn	Objection. Dr. Hughes' testimony should be
	excluded or limited for the reasons set forth in
Warner Parker (Carl)	Mr. Depp's pending Motion in Limine (No. 18).
Kouvelis, Peter (Sgt.)	Objection. Peter Kouvelis should be excluded for
(PMK – Los Angeles Police Department)	the reasons set forth in Mr. Depp's pending
T A J (S-1)	Motion in Limine (No. 3).
Lemoyne, Armand (Sgt.)	Objection. Armand LeMoyne should be excluded
(PMK – Los Angeles Police Department)	for the reasons set forth in Mr. Depp's pending
	Motion in Limine (No. 3).

No. 10 No	
Lopez, Roberto (Officer)	Objection. Roberto Lopez should be excluded for
(PMK – Los Angeles Police Department)	the reasons set forth in Mr. Depp's pending
	Motion in Limine (No. 3).
Mandel, Joel	Objection. Joel Mandel should be excluded on
1 M	relevance grounds.
Newman, Tina	Objection. Relevance, Lack of Personal
(PMK - Walt Disney Motion Pictures Group	Knowledge.
Inc.)	
Sandanaga, Marie (LAPD)	Objection. Ms. Sadanaga should be excluded for
	the reasons set forth in Mr. Depp's pending
	Motion in Limine (No. 3).
Schnell, Ronald	Objection. Mr. Schnell should be excluded for
	the reasons set forth in Mr. Depp's pending
	Motion in Limine (No. 15).
Spiegel, David	Objection. Mr. Spiegel should be excluded for
des of a	the reasons set forth in Mr. Depp's pending
	Motion in Limine (No. 14).

Respectfully submitted,



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Counsel for Plaintiff and Counterclaim Defendant John C. Depp, II

Dated: March 29, 2022

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of March 2022, I caused copies of the foregoing to be served via email (per written agreement between the Parties) on the following:

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